

EXHIBIT K

ORIGINAL

Page 1

1
2 UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

3 - - - - - x
4 SUSAN McCARTHY,

Plaintiff,

5 - against -

6 ROOSEVELT UNION FREE SCHOOL DISTRICT;
7 DEBORAH L. WORTHAM, individually and
in her Official Capacity; CLYDE
8 BRASWELL, individually and in his
Official Capacity; EDITH HIGGINS,
individually and in her Official
9 Capacity; Roosevelt Union Free School
District employees "JOHN DOE" 1-10 (the
10 name "John Doe" be fictitious, as the
true names are presently unknown);
11 COUNTY OF NASSAU; NASSAU COUNTY POLICE
DEPARTMENT; POLICE OFFICER JOSEPH STASSI,
12 individually and in his Official
Capacity; POLICE OFFICER MONIQUE AMODEO,
13 individually and in her Official
Capacity; MEDIC MATTHEW FIELD,
14 individually and in his Official
Capacity; Nassau County employees
15 "JOHN DOE" 11-20 (the name "John Doe"
being fictitious, as the true names are
16 presently unknown),

17 Defendants.

18 - - - - - x
240 Denton Place
19 Roosevelt, New York
20 May 12, 2016
3:56 P.M.

21
22
23 WITNESS: MATTHEW FIELD
24
25

1
2
3
4
5 DEPOSITION of MATTHEW FIELD, one of the
6 Defendants herein, taken by the Plaintiff and
7 Co-Defendants herein, pursuant to The Federal Rules
8 Of Civil Procedure, held at the above-mentioned time
9 and place, before Raymond Stalker, RPR, a Notary
10 Public of the State of New York.
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1
2 A P P E A R A N C E S :

3 WOLIN & WOLIN, P.C.

Attorneys for Plaintiff

4 420 Jericho Turnpike

Jericho, New York 11753

5
6 BY: ALAN E. WOLIN, ESQ.

7 SILVERMAN & ASSOCIATES

Attorneys for Defendants

8 Roosevelt Union Free School District,

Deborah L. Wortham, Clyde Braswell,

9 Edith Higgins, district employees

John Doe 1-10

10 445 Hamilton Avenue

White Plains, New York 10601

11 BY: GERALD S. SMTIH, ESQ.

12
13 NASSAU COUNTY ATTORNEY'S OFFICE

Attorneys for Defendants

14 County of Nassau; Nassau County Police

Department; POLICE Officer Joseph Stassi,

15 Police Officer Monique Amodeo,

Medic Matthew Field, Nassau County employees

16 "JOHN DOE" 11-20

One West Street,

17 Mineola, New York 11501

18 BY: LIORA BEN-SOREK, ESQ.

1
2
3
4
5 IT IS HEREBY stipulated and agreed by and
6 among counsel for the respective parties hereto,
7 that the sealing and certification of the within
8 deposition shall be and the same hereby waived.

9 IT IS FURTHER STIPULATED AND AGREED that all
10 objections, except to the form of the question,
11 shall be reserved to the time of trial;

12 IT IS FURTHER STIPULATED AND AGREED that the
13 within deposition may be signed before any Notary
14 Public with the same force and effect as if signed
15 and sworn to before the court.
16
17
18
19
20
21
22
23
24
25

1 MATTHEW FIELD

2 M A T T H E W F I E L D, one of the Defendants
3 herein, having first been duly sworn by a Notary
4 Public of the State of New York, was examined and
5 testified as follows:

6 MS. BEN-SOREK: Pertaining to
7 Medic Matthew Field and the prior
8 deposition, which was of Police
9 Officer Amodeo, the defense would
10 request under the civil rules copies
11 of the transcripts to enabled the
12 officers and AMT to review their
13 testimony and see if there is A need
14 for any amendments or corrections.

15 MR. WOLIN: Right.

16 Good afternoon. My name Alan
17 Wolin. I am attorney and I represent
18 Ms. McCarthy in this lawsuit that she
19 has brought. I will be asking you a
20 few questions concerning the facts
21 and circumstances of the lawsuit.

22 If at any time I ask you a
23 question that you don't understand,
24 ask me to rephrase it, then I will
25 attempt to do the best I can.

1 MATTHEW FIELD

2 EXAMINATION BY

3 MR. WOLIN:

4 Q. Please state your full name for
5 the record.

6 A. Matthew Field.

7 Q. What is your present business
8 address?

9 A. Police Headquarters, 1490
10 Franklin Avenue, Mineola, New York 11501.

11 Q. Did you speak to anyone to
12 prepare for this deposition today?

13 A. Prior to?

14 Q. Yes.

15 A. I met with Ms. Sorek.

16 Q. And when did you meet with her?

17 A. Oh, probably over a month ago.

18 Q. Did you speak to anybody else,
19 besides counsel, to prepare for this
20 deposition?

21 A. No, sir.

22 Q. Did you review any documents to
23 prepare for this deposition?

24 A. The PCR, sir.

25 Q. And that's the patient care

1 MATTHEW FIELD

2 report?

3 A. Yes, sir.

4 Q. I show you what had been marked
5 as Exhibit 11; is that patient care report
6 that you reviewed?

7 A. It looks to be the same.

8 Q. Did you review any other
9 documents to prepare to deposition?

10 A. I looked at my copy of the memo
11 book.

12 MR. WOLIN: Please mark this.

13 (Whereupon, at this time, the
14 above-mentioned memo book was marked
15 by the reporter as Plaintiff's
16 Exhibit 16, for identification, as of
17 this date.)

18 Q. I show what we have just marked
19 as Exhibit 16; is that excerpt from the memo
20 book that you were referring to?

21 A. Its looks to be, sir.

22 Q. Did you review any other
23 documents to prepare this deposition?

24 A. No.

25 Q. And by whom are you currently

1 MATTHEW FIELD

2 employed?

3 A. Nassau County Police Department.

4 Q. And how long have you been
5 employed by the Nassau County Police
6 Department?

7 A. Since 2009.

8 Q. And what is your job title?

9 A. Nassau County Police Department
10 police Medic.

11 Q. Have you served in that job title
12 during your entire career with Nassau County?

13 A. No.

14 Q. How long have been a medic?

15 A. Since February of 2011.

16 Q. And prior to that what was your
17 job title?

18 A. Communications operator.

19 Q. That was with the police
20 department also; is that correct?

21 A. Yes, sir.

22 Q. And what training have you
23 received to be a medic?

24 A. I went through the Fire Police
25 Academy to become an emergency medical

1 MATTHEW FIELD

2 technician critical care. Then I went
3 through the police department portion of it
4 once I got hired in 2011, which included
5 training in the police academy and then also
6 in the Fire Police Academy.

7 Q. Now, we have also used the
8 acronym AMT?

9 A. Yes, sir.

10 Q. Are you also considered and AMT?

11 A. We were until recent.

12 Q. So the title has changed?

13 A. Yes.

14 Q. But the job duties are the same?

15 A. Yes, sir.

16 Q. Going back to May 2014, your job
17 was then an AMT?

18 A. Yes, sir.

19 Q. Just a couple of other background
20 questions. Have you ever testified under
21 oath before?

22 A. No, sir.

23 Q. Have you ever been convicted of a
24 crime?

25 A. No, sir.

1 MATTHEW FIELD

2 Q. Now, I want to direct your
3 attention to May 28th, 2014; were you working
4 on that day?

5 A. Yes, sir.

6 Q. What tour were you working?

7 A. Day tour. I work 0700 to 1900.

8 Q. Did there come a time that you
9 were dispatched to Sportsman Avenue in
10 Freeport?

11 A. Yes, sir.

12 Q. How were you dispatched to that
13 location?

14 A. Fire and Communications Bureau.

15 Q. What did the Communication Bureau
16 say at the time?

17 A. I don't recall.

18 Q. Is it a dispatcher who dispatches
19 you to the scene?

20 A. Yes, sir.

21 Q. And do they tell you the type of
22 situation that it is?

23 A. To the best of their knowledge.

24 Q. Do you remember what they said in
25 this situation?

1 MATTHEW FIELD

2 A. No.

3 Q. Do you remember anything about
4 what they said?

5 A. No, sir.

6 Q. A time came that you reported to
7 this location in Sportsman's Avenue in
8 Freeport?

9 A. Just rephrase.

10 Q. Did a time come on May 28th, 2014
11 that you responded to Sportsman Avenue in
12 Freeport?

13 A. The time come meaning?

14 Q. Did you?

15 A. Yes, sir.

16 Q. That's just a fancy way that
17 lawyers sometimes phrase it.

18 Did you report to Sportsman
19 Avenue in Freeport on May 28th?

20 A. Yes, sir.

21 Q. Were you driving an ambulance in
22 going there?

23 A. Yes, sir. We always drive
24 ambulances.

25 Q. When you arrived at the scene,

1 MATTHEW FIELD

2 did you encounter any police officers?

3 A. Police officers are always
4 dispatched to the calls were assigned to,
5 yes.

6 Q. Were there police officers
7 already on the scene when you arrived?

8 A. I believe so, yes.

9 Q. Do you remember who the police
10 officers were?

11 A. Officer Stassi and Amodeo.

12 Q. Had you every met them before
13 that day?

14 A. Yes, sir.

15 Q. Approximately how many times?

16 A. I wouldn't be able to give a
17 number, sir.

18 Q. When you arrived on the scene,
19 did you speak to either or both of the police
20 officers?

21 A. I don't recall specifically, but
22 typically yes, I do.

23 Q. Do you remember specifically what
24 happened on May 28th when you arrived?

25 A. Just from what I remember of what

1 MATTHEW FIELD

2 I wrote in my PCR.

3 Q. You can use it to refresh your
4 recollection by looking at it, but I would
5 like you to testify as best you can
6 independently of looking at the documents,
7 but you can look at the document to refresh
8 your recollection.

9 Can you tell me in your own words
10 what happened when you arrived at the 233
11 Sportsman Avenue location?

12 A. The police stated they had a
13 female that told the school psychologist that
14 she wanted to hurt herself.

15 Q. Do you remember which of the
16 police officers said that to you?

17 A. No.

18 Q. Did either of the police officers
19 say anything else to you?

20 A. I don't recall.

21 Q. Did either of police officer tell
22 you that Ms. McCarthy had told the police
23 officers that she wanted to kill herself?

24 A. Say that again.

25 Q. Did either of the police officers

1 MATTHEW FIELD

2 tell you that Ms. McCarthy had told them, the
3 police officers, in their presence that she
4 wanted to kill herself.

5 A. I don't recall.

6 Q. What, if anything, else did the
7 police officers say to you when you arrived?

8 A. I don't recall.

9 Q. Now, did you see Ms. McCarthy?

10 A. Yes, sir.

11 Q. First of all, where was she when
12 you saw her?

13 A. I don't recall.

14 Q. Can you describe her demeanor
15 when you saw her?

16 A. I don't recall.

17 Q. Do you remember if she was calm,
18 do you remember if she was upset?

19 A. Specifically, no.

20 Q. Do you remember generally?

21 A. If somebody was not calm they
22 would typically either be restrained or and I
23 would have documented that. I don't see that
24 on my documentation.

25 Q. So if she was restrained it would

1 MATTHEW FIELD

2 have been on your documentation?

3 A. Yes, sir.

4 Q. What does it mean to be
5 restrained?

6 A. Handcuffed.

7 Q. Under what circumstances does a
8 police officer handcuff someone who may be
9 mentally disabled?

10 A. I'm not sure of their procedure.

11 Q. But you didn't observe her to be
12 restrained; is that correct?

13 A. I don't believe so, because
14 otherwise it would have been documented.

15 Q. Now, when you saw her, was she
16 standing, was she sitting on a chair?

17 A. I don't recall.

18 Q. When you saw her, do you recall
19 her acting out in any way, shape or form?

20 A. I don't recall.

21 Q. If she was acting out would, that
22 be in your report?

23 MS. BEN-SOREK: Objection to
24 form. You can answer.

25 A. I'm sorry.

1 MATTHEW FIELD

2 Q. Do you understand what I mean by
3 acting out?

4 A. Can you explain?

5 Q. Was she displaying any emotions,
6 was she threatening anybody --

7 A. I don't recall.

8 Q. -- was she flailing her arms or
9 legs?

10 A. I don't recall.

11 Q. Was she yelling, was she doing
12 anything to display any signs of being
13 mentally disturbed?

14 A. I don't recall, sir.

15 Q. Have you dealt with mentally
16 disturbed people in the past?

17 A. Yes, sir.

18 Q. Do they usually, in your
19 encounters with them, do they usually display
20 any type of demeanor?

21 A. All cases are different.

22 Q. Well, if somebody is truly mental
23 disturbed, what demeanor do they portray?

24 MS. BEN-SOREK: Objection. You
25 can answer.

1 MATTHEW FIELD

2 A. It's hard to say because,
3 somebody could have made statement, somebody
4 could be acting irrational, so those are two
5 separate types, but they're classified under
6 mental.

7 Q. But you don't recall there being
8 anything indicating she was anything other
9 than calm when you arrived?

10 A. I don't recall.

11 MS. BEN-SOREK: Objection.

12 Q. Did you speak to Ms. McCarthy
13 when you arrived?

14 A. Based on my PCR, yes.

15 Q. What did you say to her and what
16 did she say to you?

17 A. I don't recall specifics.

18 Q. When did you prepare the PCR?

19 A. En route to the hospital.

20 Q. So you dictated it?

21 A. We type.

22 Q. You typed it in the ambulance on
23 the way to the hospital after the officer was
24 driving?

25 A. Either there or at the hospital.

1 MATTHEW FIELD

2 I don't recall in this specific situation.

3 Q. Do you remember who drove the
4 ambulance?

5 A. Again, going back to my PCR, it
6 says, "PO Stassi."

7 Q. Then the other police officer
8 would of driven the patrol car?

9 A. Typically.

10 Q. Now, were you sitting with Ms.
11 McCarthy in what do you call it, I guess the
12 ambulance portion of the vehicle?

13 A. Yes, sir.

14 Q. Did you have any conversation
15 with her?

16 A. I don't recall specific, other
17 than what I documented here.

18 Q. While you were en route to the
19 hospital, was she calm?

20 A. I don't recall.

21 Q. If there was anything unusual or
22 anything untoward, would it be reflected in
23 your report?

24 MS. BEN-SOREK: Objection.

25 A. Yes, sir.

1 MATTHEW FIELD

2 Q. The answer is yes?

3 A. Yes, sir.

4 Q. Is there anything in your report
5 that would reflect that?

6 A. No, sir.

7 Q. Did you take her vitals?

8 A. No, sir.

9 Q. Why not?

10 A. I don't recall.

11 Q. Is it protocol that you take the
12 vitals?

13 MS. BEN-SOREK: Objection to
14 form. Ask the witness his policy.

15 Q. Is there a policy or practice
16 with reference to taking vitals?

17 A. We take vitals, but sometimes we
18 are not able to obtain them.

19 Q. Did you take her blood pressure?

20 A. No, sir.

21 Q. Did you make any effort to take
22 her blood pressure?

23 A. I don't recall.

24 Q. Now, in the comment portion you
25 state, "Upon arrival found a sixty-two year

1 MATTHEW FIELD

2 old female with police stating she told the
3 school psychologist that she wanted to kill
4 herself"; do you see that?

5 A. Yes, sir.

6 Q. Do you remember which of the
7 police officers told you that?

8 A. No, sir.

9 Q. Did you go on and say, "P-T," I
10 assume that's patient?

11 A. Yes, sir.

12 Q. "States she said my head hurts so
13 bad I would not care if I die"; do you see
14 that?

15 A. Yes, sir.

16 Q. What is the source of information
17 for that statement?

18 A. The source of information meaning
19 who said it?

20 Q. Yes.

21 A. That would be the patient.

22 Q. Did she say it in your presence?

23 A. Yes, sir.

24 Q. Did she ever say in your presence
25 that she wanted to kill herself?

1 MATTHEW FIELD

2 A. She, in my presence, stated
3 whatever I wrote on the PCR.

4 Q. But she didn't come out and say
5 it in those many words, "I want to kill
6 myself," right?

7 A. I didn't reflect that on the PCR,
8 right.

9 Q. If she had said that, would it be
10 in the PCR?

11 A. Yes, sir.

12 Q. And she told you she had a
13 headache?

14 A. Yes, sir.

15 Q. And then you say "Is upset as to
16 what is going on with her C-L-S-S," I assume
17 that means class?

18 A. I believe so.

19 Q. And did she tell that you?

20 A. Yes, sir.

21 Q. Did she tell you why she was
22 upset as to what is going on with her class?

23 A. I don't recall.

24 Q. Did she say anything else that's
25 not documented in this comments portion?

1 MATTHEW FIELD

2 A. If it's not documented, I don't
3 recall, sir.

4 Q. The comment that you say she made
5 about that, "My head hurts so bad I would not
6 care if I die," was that made in the presence
7 of the police officers?

8 A. I'm not sure. I don't recall.

9 Q. Did you ever speak to Ms.
10 McCarthy in the house when the police
11 officers were not present?

12 A. I don't recall.

13 Q. Now, what, if any, training do
14 you remember with reference to mentally
15 disturbed people?

16 MS. BEN-SOREK: Objection to
17 form. You can answer.

18 A. How to speak to people when we
19 know -- when it becomes an issue to restrain
20 somebody.

21 Q. And what do you mean when you
22 speak to people? What do people say or do
23 which would lead you to believe that they're
24 mentally disabled or mental disturbed?

25 A. Make suicidal or homicidal

1 MATTHEW FIELD

2 comments, acting irrational.

3 Q. When you say acting irrational,
4 what can one do to act irrational?

5 A. Acting aggressive, agitated.

6 Q. Did you observe her acting
7 agitated?

8 A. I don't recall.

9 Q. Did you observe her acting
10 aggressively?

11 A. I don't recall.

12 Q. Now, when you got there was there
13 any discussion between you and the police
14 officers as to whether or not she should be
15 transported to the medical center?

16 A. I don't recall.

17 Q. Did either of the police officers
18 ask you your opinion as to whether or not she
19 should be transported?

20 A. I don't recall, sir.

21 Q. Who is responsible for making the
22 determination as to whether or not she should
23 be transported; was it the police officers on
24 the scene?

25 MS. BEN-SOREK: Objection. You

MATTHEW FIELD

can answer.

A. Who was responsible?

Q. Yes.

A. I don't recall in this specific case.

Q. Who is normally is responsible?

A. The police officer.

Q. Now, you said you don't remember this specific case, but who else could have been responsible, other than the police officers?

A. No one.

Q. So as the AMT is it your call to determine if she goes to the hospital or are you just there to drive the ambulance?

A. We go with the police officers to the hospital. We don't drive to the hospital.

Q. You don't drive, but do you have any discretion when you arrive? Obviously, the police officers are in control of the scene, right?

A. Yes, sir.

Q. Do you have any discretion or say

1 MATTHEW FIELD

2 as an AMT as to whether or not the person
3 gets transported or is it just the police
4 officers' call?

5 MS. BEN-SOREK: Again,
6 objection. You're not asking him
7 procedure. Your asking him his
8 recollection of the --

9 MR. WOLIN: Well, I'm asking him
10 procedure. I don't know that he said
11 that he had a specific recollection.

12 MS. BEN-SOREK: I can't let him
13 testify about procedure for the
14 department. That would be expert.

15 MR. WOLIN: His procedure?

16 MS. BEN-SOREK: His procedure,
17 yes, his recollection of what he
18 does.

19 MR. WOLIN: Right, exactly.

20 A. I don't know the police officers
21 procedures or the law that they, you know,
22 that they --

23 Q. As an AMT are you permitted to
24 overrule a determination of a police officer
25 in transporting somebody to the hospital?

1 MATTHEW FIELD

2 MS. BEN-SOREK: To your
3 understanding?

4 A. To my understanding? No.

5 Q. So if a police officer says
6 transport that person, you have to transport
7 that person, right?

8 MS. BEN-SOREK: Just for the
9 record, if the AMT feels --

10 A. From my understanding, yes.

11 Q. Based upon your training with
12 mentally disturbed people, did you form any
13 opinion as to whether or not on that day Ms.
14 McCarthy should have been transported?

15 MS. BEN-SOREK: You can answer.

16 A. I don't recall specifics.

17 Q. If I asked you this, I apologize.
18 Did the police officers confer with you about
19 here being transported?

20 MS. BEN-SOREK: Objection, asked
21 and answered. You can answer.

22 A. I don't recall.

23 Q. And then you did and she was
24 transported in the ambulance; is that
25 correct?

1 MATTHEW FIELD

2 A. Yes, sir.

3 Q. And you arrived at the medical
4 center?

5 A. Yes.

6 Q. And then did you speak to
7 somebody when you arrived?

8 A. We speak to the triage nurse.

9 Q. Do you remember the name of that
10 triage nurse?

11 A. Just based off of my PCR again,
12 it looks like Carson.

13 Q. And what did you say to the nurse
14 and what did the nurse say to you?

15 A. I don't remember specifics.

16 Q. Do you remember generally?

17 A. Typically we tell them what
18 happened, which is reflected in the comments
19 portion of my PCR.

20 Q. How long did you remain in the
21 hospital on this case?

22 A. Physically in the hospital?

23 Q. Yes?

24 A. I don't recall.

25 Q. Is it reflected in your memo

1 MATTHEW FIELD

2 book?

3 A. Well, this gives the time that we
4 got to the hospital and the time I went back
5 in service.

6 MS. BEN-SOREK: You are pointing
7 to Exhibit 11, the PCR for that?

8 THE WITNESS: Right.

9 A. I don't know if that whole 43
10 minutes I was physically inside the hospital.

11 Q. So you were dispatched at 1412,
12 which is twelve minutes after two, right?

13 A. Yes, sir.

14 Q. And you were at the residence at
15 twenty-one minutes after the hour, correct?

16 A. Yes, sir.

17 Q. And you say you departed scene
18 twenty-seven minutes after the hour, so you
19 were in the residence or at the residence for
20 approximately six minutes?

21 A. Yes, sir.

22 Q. And then you arrived at the
23 medical center at 1447 or 2:47?

24 A. Yes, sir.

25 Q. Then it says clear 1530.

1 MATTHEW FIELD

2 A. Yes.

3 Q. What does clear mean?

4 A. Back in service.

5 Q. Does that mean you left the
6 hospital?

7 A. Well, sometimes I go -- we have
8 to restock, but it doesn't necessarily mean
9 that I was in the hospital for that time
10 period.

11 Q. Can you tell that by looking at
12 your memo book?

13 A. It's going to reflect the same
14 time, sir.

15 Q. After you arrived and spoke to
16 the triage nurse, did you speak to anyone
17 else at the hospital concerning this matter?

18 A. I don't recall.

19 Q. Again, I may have asked you this,
20 I'm not trying to trick you up. Do you
21 recall what Ms. McCarthy's demeanor was in
22 the ambulance en route to the hospital?

23 A. I don't recall, sir.

24 Q. Now, you state in the patient
25 care report, you use the word depression; do

1 MATTHEW FIELD

2 you see that?

3 A. Yes, sir?

4 Q. What was your source of
5 information for that.

6 A. Based off of the medications.

7 Q. And who told you about the
8 medications?

9 A. Again, I don't remember specific,
10 but typically it's the patient.

11 Q. Do you remember Ms. McCarthy
12 being cooperative with you in furnishing you
13 this information?

14 A. I don't remember specific, but if
15 she -- if I wrote it here I got it from her
16 and then that would mean that she was
17 compliant.

18 Q. Were you there already when Ms.
19 McCarthy was told that she was going to have
20 to be transported to the hospital?

21 A. I'm not sure what was said prior
22 to my arrival.

23 Q. So you don't remember if it was
24 already known by Ms. McCarthy that she was
25 going to be transported before you got there?

1 MATTHEW FIELD

2 A. I don't recall, sir.

3 Q. After you got there, do you
4 remember Ms. McCarthy being in an excited
5 state at all?

6 A. I don't recall?

7 Q. Other than this patient care
8 report, do you have any other document that
9 memorializes what happened that day?

10 A. The only other documentation I
11 would have had would be my memo book, sir.

12 Q. Do you ever give a statement to
13 the police department as to what happened?

14 A. Yes, sir.

15 Q. To whom did you give that
16 statement?

17 A. I wrote a letter.

18 Q. To whom did you give it.

19 A. I believe the First Precinct
20 sergeant, sir.

21 Q. Did you give it the same day or
22 sometime thereafter?

23 A. It would have been sometime
24 thereafter. I'm not sure.

25 Q. For what purpose did you give

1 MATTHEW FIELD

2 this statement?

3 A. He asked me for it, sir.

4 Q. Did he tell you why he was asking
5 for it?

6 A. Yes.

7 Q. What did he say?

8 A. That I was named in a lawsuit,
9 sir.

10 Q. But you gave it to the sergeant;
11 is that correct?

12 A. I believe so.

13 MR. WOLIN: And I call for the
14 production of that. I think there's
15 no privilege there.

16 MS. BEN-SOREK: Take it under
17 advisement and, again, ask for a
18 written.

19 Q. Other than this letter that you
20 gave to the sergeant, this patient care
21 report and the memo book, is there any other
22 written memorialization of what happened on
23 that day?

24 A. To the best of my knowledge, no,
25 sir.

1 MATTHEW FIELD

2 Q. After May 28th, have you spoken
3 to Officer Amodeo about what happened that
4 day?

5 A. I don't believe so, sir.

6 Q. Have you spoken to Officer Stassi
7 about what happened that day?

8 A. I do not believe so, sir.

9 Q. Have spoken to anyone in the
10 department about what happened that day?

11 A. The sergeant that I wrote the
12 letter to.

13 Q. Other than that?

14 A. No, sir.

15 Q. What was the name of the
16 sergeant?

17 A. I believe it was O'Mara.

18 MR. WOLIN: I have no further
19 questions.

20 MR. SMITH: Good afternoon, sir.
21 my name is Gerald Smith. I am an
22 attorney for the school district and
23 some of its employees who are also
24 defendants in this lawsuit like
25 yourself.

1 MATTHEW FIELD

2 EXAMINATION BY

3 MR. SMITH:

4 Q. On May 28th, did you speak to any
5 employees of the Roosevelt Union Free School
6 District regarding Ms. McCarthy?

7 A. No, sir.

8 MR. SMITH: I have nothing
9 further.

10 MS. BEN-SOREK: Can I have a
11 couple of questions?

12 MR. WOLIN: Sure.

13 EXAMINATION BY

14 MS. BEN-SOREK:

15 Q. AMT Field, at any time did Ms.
16 McCarthy mention anything about any other
17 physical complaint, other than a headache?

18 A. I don't recall specific, but if
19 she did, it would have been documented on my
20 PCR.

21 Q. Is there anything documented on
22 your PCR about a complaint of chest pain?

23 A. No, sir.

24 MS. BEN-SOREK: Thank you.

25 MR. WOLIN: I have nothing

MATTHEW FIELD

further.

(Whereupon, at 4:25 p.m.
these proceedings were
concluded.)

MATTHEW FIELD

Subscribed and sworn to

before me on this _____ day

of _____, 2016.

NOTARY PUBLIC

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

WITNESS	EXAMINATION BY	PAGE	LINE
MATTHEW FIELD	MR. WOLIN	6	4
	MR. SMITH	34	4
	MS. BEN-SOREK	34	15
REQUESTS		PAGE	LINE
Provide requested documentation		32	13

INDEX TO PLAINTIFF'S EXHIBITS

EXHIBIT	DESCRIPTION	PAGE	LINE
16	Memo book	7	18

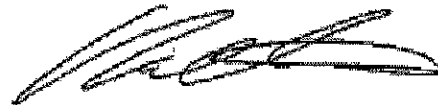
CERTIFICATION

I, RAYMOND P. STALKER, a notary public in and for the State of New York, do hereby certify:

THAT the witness whose testimony is hereby before set forth, was duly sworn by me; and that the within transcript is a true record of the testimony given by said witness. I further certify that I am not related, either by blood or marriage, to any of the parties to this action; and

THAT I am in no way interested in the outcome of this matter.

IN witness whereof, I have hereunto set my hand this 20th day of May, 2016.



RAYMOND P. STALKER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ERRATA SHEET
VERITEXT/NEW YORK REPORTING, LLC
1-800-727-6376
330 Old Country Road, 1250 Broadway
Mineola New York New York, New York

Name of Case: MCCARTHY v ROOSEVELT, et al
Date of Deposition: 5/12/16
Name of DEPONENT: MATTHEW FIELD

PAGE LINE	CHANGE	REASON
---	---	---
---	---	---
---	---	---
---	---	---
---	---	---
---	---	---
---	---	---
---	---	---
---	---	---
---	---	---
---	---	---

MATTHEW FIELD

SUBSCRIBED AND SWORN TO BEFORE
ME THIS ____ DAY OF _____, 2016.

NOTARY PUBLIC COMMISSION EXPIRES

[& - class]

Page 1

&	4	26:15,21	best 5:25 10:23 13:5
& 3:3,7	4 36:5,5	answered 26:21	32:24
0	420 3:4	anybody 6:18 16:6	blood 19:19,22
0700 10:7	43 28:9	apologize 26:17	37:10
1	445 3:10	approximately	book 7:11,14,20
	4:25 35:3	12:15 28:20	28:2 29:12 31:11
1-10 1:9 3:9	5	arms 16:8	32:21 36:12
1-800-727-6376 38:3	5/12/16 38:6	arrival 19:25 30:22	braswell 1:7 3:8
10601 3:10	6	arrive 24:21	broadway 38:4
11 7:5 28:7	6 36:5	arrived 11:25 12:7	brought 5:19
11-20 1:15 3:16	7	12:18,24 13:10 14:7	bureau 10:14,15
11501 3:17 6:10	7 36:12	17:9,13 27:3,7	business 6:7
11753 3:4	a	28:22 29:15	c
12 1:20	able 12:16 19:18	asked 26:17,20	c 3:2 21:16
1250 38:4	academy 8:25 9:5,6	29:19 32:3	call 18:11 24:14
13 36:8	acronym 9:8	asking 5:19 25:6,7,9	25:4 32:13
1412 28:11	act 23:4	32:4	calls 12:4
1447 28:23	acting 15:19,21 16:3	assigned 12:4	calm 14:17,21 17:9
1490 6:9	17:4 23:2,3,5,6,9	associates 3:7	18:19
15 36:6	action 37:11	assume 20:10 21:16	capacity 1:7,8,9,12
1530 28:25	address 6:8	attempt 5:25	1:13,14
16 7:16,19 36:12	advisement 32:17	attention 10:3	car 18:8
18 36:12	afternoon 5:16	attorney 5:17 33:22	care 6:25 7:5 9:2
1900 10:7	33:20	attorney's 3:13	20:13 22:6 29:25
2	aggressive 23:5	attorneys 3:3,7,13	31:7 32:20
2009 8:7	aggressively 23:10	avenue 3:10 6:10	career 8:12
2011 8:15 9:4	agitated 23:5,7	10:9 11:7,11,19	carson 27:12
2014 9:16 10:3	ago 6:17	13:11	case 24:6,10 27:21
11:10	agreed 4:5,9,12	b	38:6
2016 1:20 35:10	al 38:6	back 9:16 18:5 28:4	cases 16:21
37:15 38:23	alan 3:5 5:16	29:4	center 23:15 27:4
20th 37:15	ambulance 11:21	background 9:19	28:23
233 13:10	17:22 18:4,12 24:16	bad 20:13 22:5	certification 4:7
240 1:18	26:24 29:22	based 17:14 26:11	37:2
28th 10:3 11:10,19	ambulances 11:24	27:11 30:6	certify 37:5,9
12:24 33:2 34:4	amendments 5:14	believe 12:8 15:13	chair 15:16
2:47 28:23	amodeo 1:12 3:15	21:18 22:23 31:19	change 38:8
3	5:9 12:11 33:3	32:12 33:5,8,17	changed 9:12
32 36:8	amt 5:12 9:8,10,17	ben 3:18 5:6 15:23	chest 34:22
330 38:4	24:14 25:2,23 26:9	16:24 17:11 18:24	circumstances 5:21
34 36:5,6	34:15	19:13 22:16 23:25	15:7
3:56 1:20	answer 15:24 16:25	25:5,12,16 26:2,8	civil 2:8 5:10
	19:2 22:17 24:2	26:15,20 28:6 32:16	class 21:17,22
		34:10,14,24 36:6	

[classified - further]

Page 2

classified 17:5 clear 28:25 29:3 clyde 1:7 3:8 come 10:8 11:10,13 21:4 comment 19:24 22:4 comments 21:25 23:2 27:18 commission 38:24 communication 10:15 communications 8:18 10:14 complaint 34:17,22 compliant 30:17 concerning 5:20 29:17 concluded 35:5 confer 26:18 considered 9:10 control 24:22 conversation 18:14 convicted 9:23 cooperative 30:12 copies 5:10 copy 7:10 correct 8:20 15:12 26:25 28:15 32:11 corrections 5:14 counsel 4:6 6:19 country 38:4 county 1:11,11,14 3:13,14,14,15 8:3,5 8:9,12 couple 9:19 34:11 court 1:2 4:15 crime 9:24 critical 9:2 currently 7:25	33:4,7,10 35:9 37:15 38:23 dealt 16:15 deborah 1:6 3:8 defendants 1:17 2:6 2:7 3:7,13 5:2 33:24 defense 5:9 demeanor 14:14 16:20,23 29:21 denton 1:18 departed 28:17 department 1:11 3:14 8:3,6,9,20 9:3 25:14 31:13 33:10 deponent 38:7 deposition 2:5 4:8 4:13 5:8 6:12,20,23 7:9,23 38:6 depression 29:25 describe 14:14 description 36:11 determination 23:22 25:24 determine 24:15 dictated 17:20 die 20:13 22:6 different 16:21 direct 10:2 disabled 15:9 22:24 discretion 24:21,25 discussion 23:13 dispatched 10:9,12 12:4 28:11 dispatcher 10:18 dispatches 10:18 display 16:12,19 displaying 16:5 district 1:2,2,6,9 3:8 3:9 33:22 34:6 disturbed 16:13,16 16:23 22:15,24 26:12 document 13:7 31:8 documentation 14:24 15:2 31:10	36:8 documented 14:23 15:14 18:17 21:25 22:2 34:19,21 documents 6:22 7:9 7:23 13:6 doe 1:9,10,15,15 3:9 3:16 doing 16:11 drive 11:23 24:16,18 24:20 driven 18:8 driving 11:21 17:24 drove 18:3 duly 5:3 37:7 duties 9:14	excerpt 7:19 excited 31:4 exhibit 7:5,16,19 28:7 36:11 exhibits 36:10 expert 25:14 expires 38:24 explain 16:4
			f
			f 5:2 facts 5:20 fancy 11:16 february 8:15 federal 2:7 feels 26:9 female 13:13 20:2 fictitious 1:10,15 field 1:13,23 2:5 3:15 5:1,7 6:1,6 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1,15 35:1,7 36:5 38:7,20 fire 8:24 9:6 10:14 first 5:3 14:11 31:19 flailing 16:8 follows 5:5 force 4:14 form 4:10 15:19,24 19:14 22:17 26:12 forth 37:7 found 19:25 franklin 6:10 free 1:6,9 3:8 34:5 freeport 10:10 11:8 11:12,19 full 6:4 furnishing 30:12 further 4:9,12 33:18 34:9 35:2 37:9
		e	
		e 3:2,2,5 5:2,2 36:3 eastern 1:2 edith 1:8 3:9 effect 4:14 effort 19:21 either 12:19 13:18 13:21,25 14:22 17:25 23:17 37:10 emergency 8:25 emotions 16:5 employed 8:2,5 employees 1:9,14 3:9,15 33:23 34:5 en 17:19 18:18 29:22 enabled 5:11 encounter 12:2 encounters 16:19 entire 8:12 errata 38:2 esq 3:5,11,18 et 38:6 exactly 25:19 examination 6:2 34:2,13 36:4 examined 5:4	
d 5:2 36:3 date 7:17 38:6 day 10:4,7 12:13 26:13 31:9,21 32:23			

[generally - nurse]

Page 3

g	hurts 20:12 22:5	line 36:4,7,11 38:8	medications 30:6,8
generally 14:20	i	liora 3:18	meet 6:16
27:16	identification 7:16	lle 38:2	memo 7:10,14,19
gerald 3:11 33:21	included 9:4	location 10:13 11:7	27:25 29:12 31:11
give 12:16 31:12,15	independently 13:6	13:11	32:21 36:12
31:18,21,25	index 36:10	long 8:4,14 27:20	memorialization
given 37:9	indicating 17:8	look 13:7	32:22
gives 28:3	individually 1:6,7,8	looked 7:10	memorializes 31:9
go 20:9 24:17 29:7	1:12,13,14	looking 13:4,6 29:11	mental 16:22 17:6
goes 24:15	information 20:16	looks 7:7,21 27:12	22:24
going 9:16 11:22	20:18 30:5,13	m	mentally 15:9 16:13
18:5 21:16,22 29:13	inside 28:10	m 5:2	16:15 22:14,24
30:19,25	interested 37:12	making 23:21	26:12
good 5:16 33:20	irrational 17:4 23:2	mark 7:12	mention 34:16
guess 18:11	23:3,4	marked 7:4,14,18	mentioned 2:8 7:14
h	issue 22:19	marriage 37:10	met 6:15 12:12
h 5:2	j	matter 29:17 37:13	mineola 3:17 6:10
hamilton 3:10	jericho 3:4,4	matthew 1:13,23 2:5	38:4
hand 37:15	job 8:8,11,17 9:14	3:15 5:1,7 6:1,6 7:1	minutes 28:10,12,15
handcuff 15:8	9:16	8:1 9:1 10:1 11:1	28:18,20
handcuffed 15:6	john 1:9,10,15,15	12:1 13:1 14:1 15:1	monique 1:12 3:15
happened 12:24	3:9,16	16:1 17:1 18:1 19:1	month 6:17
13:10 27:18 31:9,13	joseph 1:11 3:14	20:1 21:1 22:1 23:1	n
32:22 33:3,7,10	k	24:1 25:1 26:1 27:1	n 3:2 36:3
hard 17:2	kill 13:23 14:4 20:3	28:1 29:1 30:1 31:1	name 1:10,15 5:16
head 20:12 22:5	20:25 21:5	32:1 33:1 34:1 35:1	6:4 27:9 33:15,21
headache 21:13	know 22:19 25:10	35:7 36:5 38:7,20	38:6,7
34:17	25:20,21 28:9	mccarthy 1:3 5:18	named 32:8
headquarters 6:9	knowledge 10:23	13:22 14:2,9 17:12	names 1:10,15
held 2:8	32:24	18:11 22:10 26:14	nassau 1:11,11,14
hereto 4:6	known 30:24	30:11,19,24 31:4	3:13,14,14,15 8:3,5
hereunto 37:14	l	34:6,16 38:6	8:9,12
higgins 1:8 3:9	l 1:6 3:8 5:2 21:16	mccarthy's 29:21	necessarily 29:8
hired 9:4	law 25:21	mean 15:4 16:2	need 5:13
homicidal 22:25	lawsuit 5:18,21 32:8	22:21 29:3,5,8	new 1:2,19 2:10 3:4
hospital 17:19,23,25	33:24	30:16	3:10,17 5:4 6:10
18:19 24:15,18,19	lawyers 11:17	meaning 11:13	37:5 38:2,4,4,4
25:25 27:21,22 28:4	lead 22:23	20:18	normally 24:7
28:10 29:6,9,17,22	left 29:5	means 21:17	notary 2:9 4:13 5:3
30:20	legs 16:9	medic 1:13 3:15 5:7	35:12 37:4 38:24
hour 28:15,18	letter 31:17 32:19	8:10,14,23	number 12:17
house 22:10	33:12	medical 8:25 23:15	nurse 27:8,10,13,14
hurt 13:14		27:3 28:23	29:16

[o'mara - road]

Page 4

<p>o</p> <p>o'mara 33:17 oath 9:21 objection 15:23 16:24 17:11 18:24 19:13 22:16 23:25 25:6 26:20 objections 4:10 observe 15:11 23:6 23:9 obtain 19:18 obviously 24:21 office 3:13 officer 1:11,12 3:14 3:15 5:9 12:11 13:21 15:8 17:23 18:7 24:8 25:24 26:5 33:3,6 officers 5:12 12:2,3 12:6,10,20 13:16,18 13:23,25 14:3,7 20:7 22:7,11 23:14 23:17,23 24:12,17 24:22 25:4,20 26:18 official 1:7,8,8,12,13 1:14 oh 6:17 old 20:2 38:4 once 9:4 operator 8:18 opinion 23:18 26:13 outcome 37:12 overrule 25:24</p>	<p>patrol 18:8 per 6:24 13:2 17:14 17:18 18:5 21:3,7 21:10 27:11,19 28:7 34:20,22 people 16:16 22:15 22:18,22,22 26:12 period 29:10 permitted 25:23 person 25:2 26:6,7 pertaining 5:6 phrase 11:17 physical 34:17 physically 27:22 28:10 place 1:18 2:9 plains 3:10 plaintiff 1:4 2:6 3:3 plaintiff's 7:15 36:10 please 6:4 7:12 po 18:6 pointing 28:6 police 1:11,11,12 3:14,14,15 5:8 6:9 8:3,5,9,10,19,24 9:3 9:5,6 12:2,3,6,9,19 13:12,16,18,21,22 13:25 14:3,7 15:8 18:7 20:2,7 22:7,10 23:13,17,23 24:8,11 24:17,22 25:3,20,24 26:5,18 31:13 policy 19:14,15 portion 9:3 18:12 19:24 21:25 27:19 portray 16:23 practice 19:15 precinct 31:19 prepare 6:12,19,23 7:9,23 17:18 presence 14:3 20:22 20:24 21:2 22:6 present 6:7 22:11</p>	<p>presently 1:10,16 pressure 19:19,22 prior 5:7 6:13 8:16 30:21 privilege 32:15 probably 6:17 procedure 2:8 15:10 25:7,10,13,15,16 procedures 25:21 proceedings 35:4 production 32:14 protocol 19:11 provide 36:8 psychologist 13:13 20:3 public 2:10 4:14 5:4 35:12 37:4 38:24 purpose 31:25 pursuant 2:7</p>	<p>referring 7:20 reflect 19:5 21:7 29:13 reflected 18:22 27:18,25 refresh 13:3,7 regarding 34:6 related 37:10 remain 27:20 remember 10:24 11:3 12:9,23,25 13:15 14:17,18,20 18:3 20:6 22:14 24:9 27:9,15,16 30:9,11,14,23 31:4 rephrase 5:24 11:9 report 7:2,5 11:18 15:22 18:23 19:4 29:25 31:8 32:21</p>
<p>p</p> <p>p 3:2,2 20:9 37:4,18 p.c. 3:3 p.m. 1:20 35:3 page 36:4,7,11 38:8 pain 34:22 parties 4:6 37:11 patient 6:25 7:5 20:10,21 29:24 30:10 31:7 32:20</p>		<p>q</p> <p>question 4:10 5:23 questions 5:20 9:20 33:19 34:11</p>	<p>reported 11:6 reporter 7:15 reporting 38:2 represent 5:17 request 5:10 requested 36:8 requests 36:7 reserved 4:11 residence 28:14,19 28:19 respective 4:6 responded 11:11 responsible 23:21 24:3,7,11 restock 29:8 restrain 22:19 restrained 14:22,25 15:5,12 review 5:12 6:22 7:8 7:22 reviewed 7:6 right 5:15 21:6,8 24:23 25:19 26:7 28:8,12 road 38:4</p>
		<p>r</p> <p>r 3:2 raymond 2:9 37:4 37:18 reason 38:8 recall 10:17 12:21 13:20 14:5,8,13,16 15:17,18,20 16:7,10 16:14 17:7,10,17 18:2,16,20 19:10,23 21:23 22:3,8,12 23:8,11,16,20 24:5 26:16,22 27:24 29:18,21,23 31:2,6 34:18 received 8:23 recollection 13:4,8 25:8,11,17 record 6:5 26:9 37:8 reference 19:16 22:14</p>	

[roosevelt - usually]

Page 5

roosevelt 1:6,9,19 3:8 34:5 38:6 route 17:19 18:18 29:22 rpr 2:9 rules 2:7 5:10	28:21,24 29:14,23 30:3 31:2,11,14,20 32:3,9,25 33:5,8,14 33:20 34:7,23 sitting 15:16 18:10 situation 10:22,25 18:2 six 28:20 sixty 19:25 smith 33:20,21 34:3 34:8 36:5 smtih 3:11 somebody 14:21 16:22 17:3,3 22:20 25:25 27:7 sorek 3:18 5:6 6:15 15:23 16:24 17:11 18:24 19:13 22:16 23:25 25:5,12,16 26:2,8,15,20 28:6 32:16 34:10,14,24 36:6 sorry 15:25 source 20:16,18 30:4 speak 6:11,18 12:19 17:12 22:9,18,22 27:6,8 29:16 34:4 specific 18:2,16 24:5 24:10 25:11 30:9,14 34:18 specifically 12:21,23 14:19 specifics 17:17 26:16 27:15 spoke 29:15 spoken 33:2,6,9 sportsman 10:9 11:11,18 13:11 sportsman's 11:7 stalker 2:9 37:4,18 standing 15:16 stassi 1:11 3:14 12:11 18:6 33:6	state 2:10 5:4 6:4 19:25 29:24 31:5 37:5 stated 13:12 21:2 statement 17:3 20:17 31:12,16 32:2 states 1:2 20:12 stating 20:2 stipulated 4:5,9,12 street 3:16 subscribed 35:8 38:22 suicidal 22:25 sure 15:10 22:8 30:21 31:24 34:12 susan 1:3 sworn 4:15 5:3 35:8 37:7 38:22	tour 10:6,7 training 8:22 9:5 22:13 26:11 transcript 37:8 transcripts 5:11 transport 26:6,6 transported 23:15 23:19,23 25:3 26:14 26:19,24 30:20,25 transporting 25:25 triage 27:8,10 29:16 trial 4:11 trick 29:20 true 1:10,15 37:8 truly 16:22 trying 29:20 turnpike 3:4 twelve 28:12 twenty 28:15,18 two 17:4 19:25 28:12 type 10:21 16:20 17:21 typed 17:22 types 17:5 typically 12:22 14:22 18:9 27:17 30:10
s s 3:2,11 21:16,16 saw 14:12,15 15:15 15:18 says 18:6 26:5 28:25 scene 10:19 11:25 12:7,18 23:24 24:23 28:17 school 1:6,9 3:8 13:13 20:3 33:22 34:5 sealing 4:7 see 5:13 14:9,23 20:4,13 30:2 separate 17:5 sergeant 31:20 32:10,20 33:11,16 served 8:11 service 28:5 29:4 set 37:7,14 seven 28:18 shape 15:19 sheet 38:2 show 7:4,18 signature 37:17 signed 4:13,14 signs 16:12 silverman 3:7 sir 6:21,24 7:3,21 8:21 9:9,15,18,22 9:25 10:5,11,20 11:5,15,20,23 12:14 12:17 14:10 15:3 16:14,17 18:13,25 19:3,6,8,20 20:5,8 20:11,15,23 21:11 21:14,20 22:3 23:20 24:24 27:2 28:13,16	t t 5:2,2 20:9 take 19:7,11,17,19 19:21 32:16 taken 2:6 technician 9:2 tell 10:21 13:9,21 14:2 21:19,21 27:17 29:11 32:4 testified 5:5 9:20 testify 13:5 25:13 testimony 5:13 37:6 37:9 thank 34:24 think 32:14 threatening 16:6 time 2:8 4:11 5:22 7:13 10:8,16 11:6 11:10,13 28:3,4 29:9,14 34:15 times 12:15 title 8:8,11,17 9:12 today 6:12 told 13:13,22 14:2 20:2,7 21:12 30:7 30:19	u understand 5:23 16:2 understanding 26:3 26:4,10 union 1:6,9 3:8 34:5 united 1:2 unknown 1:10,16 untoward 18:22 unusual 18:21 upset 14:18 21:15 21:22 use 29:25 usually 16:18,19	

[v - york]

Page 6

v
v 38:6
vehicle 18:12
veritext 38:2
vitals 19:7,12,16,17
w
w 5:2
waived 4:8
want 10:2 21:5
wanted 13:14,23 14:4 20:3,25
way 11:16 15:19 17:23 37:12
went 8:24 9:2 28:4
west 3:16
whereof 37:14
white 3:10
witness 1:23 19:14 28:8 36:4 37:6,9,14
wolin 3:3,3,5 5:15 5:17 6:3 7:12 25:9 25:15,19 32:13 33:18 34:12,25 36:5
word 29:25
words 13:9 21:5
work 10:7
working 10:3,6
wortham 1:6 3:8
written 32:18,22
wrote 13:2 21:3 30:15 31:17 33:11
x
x 1:3,17 36:3
y
year 19:25
yelling 16:11
york 1:2,19 2:10 3:4 3:10,17 5:4 6:10 37:5 38:2,4,4,4

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and
(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF SEPTEMBER 1, 2014. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.